

At Häfner, we value integrity, respect and trust. Ethical conduct, equality of opportunity and compliance with laws and regulations are core elements of our business.

## **1. Business ethics**

### **1.1 Compliance with the Law**

At Häfner, we comply with all applicable laws and regulations, including all applicable tax and financial laws and regulations.

### **1.2 Commercial Bribery**

We comply with all applicable anti-corruption laws and regulations. These include the US Foreign Corrupt Practices Act, the UK Bribery Act, the OECD Anti-Bribery Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, and all other applicable national and international conventions on preventing and combating corruption.

Additionally, our employees must not attempt to bribe or blackmail any employee, representative or agent of our business associates or to provide any such person with kickbacks or any other improper payments or inducements including inappropriate gifts.

Our employees are also prohibited from accepting bribes, kickbacks or any other improper payments or inducements, including inappropriate gifts, from our business associates. Any attempts to offer improper inducements must be reported to management at Häfner without delay

### **1.3 Political Activities and Lobbying**

Häfner does not use any resources for any political activities. Nor may any political contributions be made or gifts be presented in Häfner's name to any elected official or any candidate for public office. In allocating political donations of its own (including those of affiliated political action committees), Häfner ensures that such contributions are not declared as or implied to constitute endorsements or sponsorship from Häfner and that no expectations of any reciprocal benefit for Häfner are conveyed. Without prior written approval from senior management at Häfner, no activities may be carried out on behalf of Häfner that are designed to influence decisions made or measures taken by government officials in a manner that would require Häfner or their agents to register as lobbyists.

## 1.4 Export Bans / Terrorism Activities

Häfner undertakes to abide by all economic sanctions or trade embargoes adopted by the United States and any other relevant jurisdictions, independently of whether these sanctions or embargoes apply to foreign countries, political organisations, or specific foreign individuals and entities.

Häfner does not engage directly or indirectly in terrorist activity or support terrorist activity.

Affiliate companies and managers or directors at business associates and their affiliates must not appear on lists of terrorists or terrorist organisations compiled by the US government or any other national or international body. Such lists include, among others, the following:

- The US Treasury Department's Specially Designated Nationals List;
- The US State Department's Terrorist Exclusion List;
- The United Nations List Pursuant to Security Council Resolution 1390 (2002), Paragraph 4(B) of Resolution 1267(1999) and Paragraph 8(C) of Resolution 1333(2000); and
- The European Union List Implementing Article (2)(3) of Regulation (EC) No. 2580/2001 on Specific Restrictive Measures Directed Against Certain Persons and Entities with a View to Combating Terrorism.

## 1.5 Conflicts of Interest

Häfner employees who become aware of a conflict of interest are required to notify management at Häfner of the conflict of interest without delay. A conflict of interest exists when the personal interests of an employee or business associate of Häfner improperly interfere, or appear to improperly interfere, with the interests of Häfner.

## 1.6 Confidentiality

Häfner complies with all applicable rules and regulations governing the protection, use and disclosure of secret, confidential and personal information. Several examples of what information is considered confidential are given below:

Confidential information can include, among other kinds of information:

- Trade secrets, security-related information and other business practices or processes, policies, strategies, procedures or expertise
- Internal and external audit reports
- Non-public portions of investigative reports or other reports or information submitted to regulators
- Software, data processing programs, databases
- Customer or supplier lists, telephone or other contact lists and other information about customers
- Customer presentations
- Information on members of staff at customers or suppliers
- Cost, pricing or financial information
- Employee directories, lists, telephone numbers, or other information about employees
- Remuneration, health or personnel records of employees
- Business or marketing-related plans and research
- Information published only on the internal websites of the Company
- All information which is not readily available from a public source
- Information exchanged between parties in confidence

## **1.7 Supplier Relationships with Third Parties**

Häfner expects and requires its suppliers to take all reasonable measures to ensure that their own suppliers adopt and maintain an equally rigorous position on compliance with applicable laws and regulations. No supplier of Häfner will ever participate indirectly in any activities prohibited by this Code of Conduct by engaging a third party to perform prohibited activities on behalf of the Häfner supplier in question, or by failing to take suitable disciplinary measures against any third party proven to have engaged in activities prohibited by this Code of Conduct.

## **2. Labour Law**

Häfner is committed to upholding the human rights of workers and treating them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, and direct employees and workers of any other types.

### **2.1 Forced Labour and Child Labor**

Häfner does not make use of forced or involuntary labour and complies with all applicable labour laws, rules, and regulations, including all laws prohibiting the solicitation, facilitation, or any other use of forced or involuntary labour.

Häfner does not make use of child or under-age labour as described in the Conventions Nos. 138 (Minimum Age Convention) and 182 (Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour) of the International Labour Organization (ILO).

### **2.2 Fair treatment / Prohibition of Discrimination**

Häfner complies with all applicable labour law and employment-related laws and treats all workers with dignity and respect. Häfner does not threaten workers in any way or subject them to harsh or inhumane treatment, including sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse.

Häfner does not discriminate in hiring or employment practices on the basis of race, religion, age, national or ethnic origin, sexual orientation, gender, gender identity, marital status, political affiliation, or disability.

### **2.3 Protection of the Privacy of Häfner Employees**

Most jurisdictions have regulations relating specifically to the privacy of natural persons including employees and customers.

Personal information should never be disclosed to anyone outside of Häfner except as permitted by law and in the course of the proper conduct of our business, where disclosure is required by legal process, or where disclosure has been legally authorized in a proper manner.

## **3. Occupational Health and Safety**

Häfner erkennt an, dass ein sicheres und gesundes Arbeitsumfeld neben der weitest möglichen Verringerung von Arbeitsunfällen und Berufserkrankungen dazu beiträgt, die Qualität von Produkten und Dienstleistungen, die Konsistenz der Produktion und die Mitarbeiterbindung und Arbeitsmoral zu verbessern. Darüber hinaus erkennt Häfner an, dass die kontinuierliche Einbeziehung und Weiterbildung von Beschäftigten eine wesentliche Voraussetzung dafür ist, kritische Punkte in Bezug auf Gesundheit, Arbeitsschutz und Sicherheit am Arbeitsplatz zu erkennen und zu beseitigen.

Häfner acknowledges that a safe and healthy work environment minimises the incidence of occupational injury and illness and enhances the quality of products and services and the consistency of production as well as boosting worker retention and morale. In addition, Häfner acknowledges that ongoing input from workers and training and education for workers represent important prerequisites for identifying and resolving critical health and safety issues in the workplace.

Häfner provides its workers with a safe and healthy working environment that complies with all applicable laws and regulations, especially in the areas listed below:

- Occupational safety
- Emergency preparedness
- Occupational injury and illness
- Occupational hygiene
- Machine guarding and equipment safety
- Sanitary facilities and hygiene

#### **4. The Environment**

Häfner acknowledges that environmental responsibility is integral to producing world class products. In manufacturing operations, adverse effects on the community, the environment and natural resources must be minimised and the health and safety of the public must be safeguarded.

Recognised management systems such as ISO 14001 and the Eco-Management and Audit Scheme (EMAS) were drawn on as reference material during the preparation of this code and can be a useful source of supplementary information.

##### **4.1 Compliance with Environmental Regulations**

Häfner undertakes to comply with all applicable laws, rules, and regulations in the areas of health and safety and environmental protection. This includes, among others, the following elements:

- Environmental permits and reporting
- Pollution prevention and resource reduction
- Hazardous materials
- Waste water and solid waste
- Air emissions

#### **5. Management of the Code**

##### **5.1 Supply Chain Responsibility**

Häfner advocates responsibility in supplier sourcing practices.

This encompasses, in particular, avoidance of the use of “conflict materials” as described in the US Dodd-Frank Act.

Häfner undertakes to take all necessary and reasonable measures to ensure that all reporting to business associates complies with the provisions of all applicable laws and regulations.

##### **5.2 Accounting Records**

Häfner undertakes to maintain proper accounting records that comply with the laws and professional requirements of each jurisdiction within which Häfner operates.

Accounting records must not in any way be intentionally false or misleading.

### 5.3 Keeping and Retention of Documentation

Häfner keeps and stores records necessary to demonstrate compliance with this Code of Conduct. The Company reserves the right to amend, alter, suspend or cancel this Code at any time for any reason.

Jan Häfner

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